

THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED
WILKES BARRE
OCT 07 2020
MS
DEPUTY CLERK

IN RE SEALED MATTER:
Complaint and Affidavit of
Probable Cause and Warrant

5:20 MJ 57

MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, moves pursuant to Local Rule 49 to file the documents accompanying this Motion under seal for the reasons set forth in the accompanying sealed declaration in support of the government's motion to seal.

WHEREFORE, for the foregoing reasons, the United States moves to seal this Motion and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

/s/ Robert J. O'Hara
ROBERT J. O'HARA
Assistant United States Attorney
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robert.o'hara@usdoj.gov Dated:

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DECLARATION IN SUPPORT OF MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, submits the following Declaration in Support of the Government's Motion to Seal, pursuant to Local Rule 49.

1. Your declarant states that, in the view of your declarant, this declaration and the following documents should be filed under seal:

Criminal Complaint and Affidavit of Probable Cause

2. The United States requests that the above-referenced documents, and this Motion, remain under seal pending:

☐ Further Order of Court; or

☒ Written notification by the United States that these pleadings no longer need to remain filed under seal; or

☐ _____

3. In support of this Motion, the United States alleges that filing these pleadings under seal is necessary in order to:

- ☒ Preserve the integrity of this ongoing case;
- ☒ Ensure the safety of investigative personnel;
- ☐ Protect the identity of potential witnesses;
- ☒ Allow for the seizure of evidence;
- ☒ Permit the arrest of those charged with violations of criminal laws; or

WHEREFORE, for the foregoing reasons, the United States moves to seal this Declaration and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,

/s/ Robert J. O'Hara
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Dated: October 6, 2020